

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
 Washington, D.C. 20554

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FEB - 3 2003

In the Matter of )

Federal Communications Commission  
 Office of Secretary

Revision of the Commission's Rules )

CC Docket No. 94-102

To Ensure Compatibility with )

Enhanced 911 Emergency Calling Systems )

Phase II Compliance Deadlines for Non- )

Nationwide CMRS Carriers )

To: Chief, Wireless Telecommunications Bureau  
 Chief, Enforcement Bureau

**TRITON PCS LICENSE COMPANY L.L.C.  
 PHASE II E911 IMPLEMENTATION REPORT  
 FEBRUARY 3, 2003**

Triton PCS License Company L.L.C. ("Triton"), by its attorneys, hereby submits its second quarterly enhanced 911 ("EO11") report to the Federal Communications Commission ("Commission") pursuant to the Commission's decision to afford Tier II carriers additional time to meet their Phase II E911 obligations.<sup>1</sup> In this report, as required by the *Order to Stay*, Triton updates the status of its pending Phase I and Phase II E911 waiver requests and reports on its deployment progress.<sup>2</sup>

**I. STATUS OF PENDING E911 PHASE I AND II REQUESTS.**

Triton operates a wireless network that covers approximately 13.6 million people in Virginia, North and South Carolina, northeastern Tennessee and northern Georgia. This service area covers six major trading areas ("MTAs") and thirty-six basic trading areas ("BTAs").

<sup>1</sup> Revisions to the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Phase II Compliance Deadline for Non-Nationwide CMRS Carriers, *Order to Stay*, CC Dkt No. 94-102, FCC 02-210, paras. 28-31 (July 26, 2002) (hereinafter "*Order to Stay*"). Tier II carriers are defined as non-nationwide carriers that had over 500,000 subscribers as of year-end 2001.

primarily in rural and secondary markets. The Triton network currently utilizes TDMA technology. Within the next year, Triton plans to overlay GSM technology for the majority of its network. The initial launch of two GSM market areas is scheduled for the second quarter of 2003.

Triton continues to make significant progress in its efforts to deploy Phase I location capability services. To date, Triton has received 167 requests for Phase I service. Of those requests, 162 (97%) are in service or in progress and 5 (3%) are on hold. For specific details regarding outstanding requests, including details applicable to each request that has been pending for more than six months, please refer to Appendix A to this report.

Triton also is making significant progress towards fulfilling requests for Phase II service. Currently, Triton has 39 pending Phase II requests. Under the *Order to Stay*, Triton is not required to have Phase II service in place until March 1, 2003, or six months after a request, whichever is later.<sup>2</sup> Nevertheless, as detailed in Appendix B to this report and as discussed further below, Triton is working diligently to implement Phase II service so that Phase II service will be available in its markets before the March 1 deadline.

Appendices A and B include information on all pending requests for Phase I and Phase II service received from individual public safety answering points ("PSAPs"). These appendices list the name of the PSAP, the date the request was received, whether or not the request is valid, and the status of the request.<sup>3</sup> To the extent any request has been pending for more than six

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<sup>2</sup> As required in the *Order to Stay*, Triton is providing this quarterly report to the Executive Directors of APCO, NENA and NASNA and their counsel.

<sup>3</sup> *Order to Stay*, *supra* note 1, at para. 39.

<sup>4</sup> *Id.* at para. 29.

months. the appendices list specific reasons for the delay, steps taken to resolve the problem, and anticipated date of full completion of the necessary work.'

**II. TRITON IS DEPLOYING NETWORK BASED TDOA/AOA LOCATION HARDWARE WITHIN ITS MARKETS TO SERVICE ITS PHASE II REQUESTS.**

No deployment benchmark date fell due in the period preceding this quarterly report. The following is a description of the work undertaken by Triton to prepare its network to meet the first March 1, 2003 benchmark date

As indicated in its November 30, 2001, petition for waiver, Triton is committed to a network-based location system for its existing TDMA network.' During the summer of 2002, to prepare for the deployment of time difference of arrival/angle of arrival ("TDOA/AOA") hardware into Triton's cell sites. Triton undertook market planning, market design, and site surveys for a large portion of its Phase II request areas. To increase Triton's efficiency and effectiveness in responding to PSAP Phase II requests, certain groups of PSAP Phase II requests have been consolidated and Triton will deploy E911 solutions for these PSAPs as a single market area based upon the basic trading area (BTA). This will allow the TDOA/AOA equipment to "share" resources among several PSAPs, thus allowing Triton to use its limited resources more efficiently to better implement E911 Phase II service.

Triton identified certain cell sites and counties where TDOA/AOA deployment may be subject to delays or obstacles. For example, and as detailed in Appendix B, zoning issues in Charlottesville, Virginia/Albemarle County continue to delay the installation of equipment at the Triton cell sites. While Triton has filed applications with the county for zoning clearance for the

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<sup>5</sup> *Id.*

<sup>6</sup> *Petition for Waiver of the E911 Phase II Location Technology Implementation Rules*, CC Dkt. 94-102 (Nov. 30, 2001).

installation of the necessary network based location equipment, Triton has no control over whether the county Zoning Board will act on its request and, in fact, the Board has already deferred action on the Triton requests during its monthly meetings. Triton nevertheless continues to work with the local PSAP in Albemarle County as the implementation date approaches.

Overall, TDOA hardware has been installed into approximately 70 cell sites in requesting PSAP areas, with additional deployments scheduled for February. Triton is conducting noli-911 call testing in the deployed areas. Initial results have yielded accurate and acceptable results.

However, as detailed in the attached appendices, there are requesting areas that present unique challenges. Some requesting areas are extremely rural in nature with very few cell sites available to serve as components of the network based location system. Additionally many requesting areas are served only by a line of cell sites,<sup>7</sup> often along a major interstate or state route. In these areas, initial market planning has indicated the necessity for the inclusion of AOA technology in the deployment of the network based location solution to supplement the standard TDOA technology. The use of AOA in a cell site requires additional antennas to allow the measurements necessary to provide AOA-based location information. This introduces an additional delay in the implementation of the network based location technology in these areas, as Triton must renegotiate with landlords and tower owners, conduct structural engineering studies, and take extra time to physically install the AOA antennas and to calibrate their use into the overall location network.

Given the large number of locations where Triton must deploy equipment to support Phase II, the limited availability of vendor resources and the short time remaining, completing

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Often referred to as a "Picket Fence."

deployment is a difficult task. Nevertheless, it is anticipated that all requesting areas will have E911 Phase II coverage by the March 1 deadline. But as the project proceeds through the month of February, it may prove necessary to file a supplement to this report and request temporary relief in certain requesting areas.

The necessary software to support the network-based solution has been installed within Triton's mobile switching centers ("MSCs"). The central controller for the TDOA/AOA location network has been installed in one of Triton's MSC locations and has been tested. Triton's E5 links to its mobile positioning center ("MPC") provider, Intrado, from the TDOA/AOA network have been installed. Initial PSAP integration and testing began with York County, Virginia during the last week in January. However, this initial PSAP testing is dependent upon numerous factors, including testing the MSC software to ensure that proper messaging is being sent to the network based location equipment and the MPC. Also, Triton and the MPC provider are working to migrate from one MPC platform to another (Openwave MPC to the Intrado IMPC). This migration is required to take place prior to the initial PSAP testing. Dependent upon the outcome of this initial integration and testing, other deployed PSAPs will be integrated throughout the month of February.

Given that the first benchmark requires Triton to provide Phase II E911 service to at least fifty percent of a requesting PSAP's coverage area or population, Triton is tracking the 911 calls made over its network, allowing Triton to prioritize the deployment of TDOA/AOA hardware in heavier volume E911 Phase II areas. Cell sites are mapped according to the volume of 911 calls placed over the monitoring period, allowing Triton to better utilize its limited resources,

#### **111. GSM OVERLAY NETWORK**

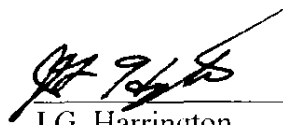
As outlined in its previous quarterly report, Triton intends to utilize the same network-based TDOA/AOA location solution it is deploying for its TDMA network. Triton continues working with its network-based location vendor, Grayson Wireless, to implement GSM capability within its TDOA/AOA network-based location equipment. As Triton is now anticipating providing commercial service with its GSM network in the first part of the second quarter of 2003 at the earliest, Triton expects to have its GSM E911 network-based location solution up and running in each of its USM markets by then.

#### **IV. ADDITIONAL QUESTIONS**

Should there be any questions or if any additional information is required, contact the undersigned.

Respectfully submitted,

**TRITON PCS LICENSE COMPANY, LLC**

  
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J.G. Harrington  
Christina H Burrow

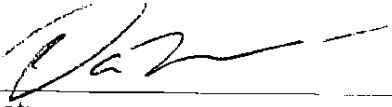
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February 3, 2003

## AFFIDAVIT

I, David D. Clark, an officer of TRITON PCS LICENSE CO. L.L.C. ("Triton"), declare under penalty of perjury pursuant to 47 C.F.R. § 1.16 of the Federal Communications Commission's rules that to the best of my knowledge and belief the foregoing is true and correct.

  
Signature

David D. Clark  
Name

EVP & CRO  
Title

Triton PCS License Co. L.L.C

February 3, 2003

## APPENDIX A

### Triton PCS License Company, L.L.C.. - Pending E911 Phase I Requests

PSAP	State	Date of Phase One (1) Request	Considered /alid at this time?	Status	Notes
Beaufort County	SC	07/12/99	No	11/21/03 PSAP Manager says will be ready by 3/31/03.	Beaufort and Hilton Head will implement at the same time after 3/31/03.
Hilton Head Island	SC	07/12/99	No	1/21/03 PSAP Manager says will be ready by 3/31/03.	Beaufort and Hilton Head will implement at the same time after 3/31/03
Fairfield County	SC	07/19/99	Partial	PSAP cannot receive 20 digits - partially implemented - Can receive PANI and Tower Address - PSAP equipment cannot receive call back number	Anticipate if and when Phase II is requested and PSAP converts to NCAS, call back number situation will be rectified. As of 1/22/03 a meeting is planned with Verizon in mid-February 2003 for PSAP to discuss changes that (would allow them to receive 20 digits
Laurens County	SC	07/23/99	Partial	PSAP cannot receive 20 digits - partially implemented - Can receive PANI and Tower Address - PSAP equipment cannot receive call back number	Anticipate if and when Phase II is requested and PSAP converts to NCAS, call back number situation will be rectified. As of 1/22/03 a meeting is planned with Verizon in mid-February 2003 for PSAP to discuss changes that would allow them to receive 20 digits.
Colleton County	SC	07/26/99	No	PSAP is not ready.	1/24/03 PSAP is hoping to be ready for implementation by end of February, 2003.
Sumter County	SC	09/12/00	Initially No - Now Yes	Initially the LEC (Verizon) was not ready to support Phase I for this county - No Selective Router in this area	1/21/03 Verizon has indicated Sumter County should be able to connect to the Georgetown SC Selective Router by the end of 2nd Qtr 2003 PSAP will meet with LEC in mid-February 2002 to discuss connectivity.
Montgomery County/City of Christiansburg	VA	3/8/2001	Initially No - Now Yes	Initially a facilities issue - Now Trunks are due 1/28/03	End of January '03 deployment scheduled
Lee County	SC	04/16/01	Initially No - Now Yes	Initially the LEC (Verizon) was not ready to support Phase I for this county - No Selective Router in this area	1/21/03 There is a meeting with Verizon planned for mid February 2003 to discuss details for connectivity.
Liberty County	GA	09/07/01	Initially No - Now Yes	Initially no Selective Router in place - PSAP now says router in place.	1/24/03 The PSAP manager says they now have a selective router. They are currently working on their mapping. They anticipate being ready by the end of 2/03.
Stafford County	VA	9/21/2001	Initially No - Now Yes	Triton PCS not licensed in Stafford however there is a single sector that covers part of Stafford county. Stafford county is AWS territory and we are negotiating with Fredericksburg County on call routing.	Call Routing Issues have been resolved between the PSAPs - March '03 deployment scheduled
City of Radford	VA	9/25/2001	Initially No - Now Yes	Initially a facilities issue - Now Trunks are due 1/28/03	February '03 deployment scheduled
Gloucester County	VA	10/3/2001	Initially No - Now Yes	PSAP Ready	March '03 deployment scheduled



## APPENDIX A

PSAP	State	Date of Phase One (1) Request	Considered Valid at this time?	Status	Notes
Southampton County	VA	11/15/2001	Initially No - Now Yes	Migrating to new selective router - schedule has moved	March '03 deployment scheduled
Mecklenburg County	VA	12/3/2001	Initially No - Now Yes	Migrating to new selective router - schedule has moved	March '03 deployment scheduled
Sussex County	VA	12/3/2001	Initially No - Now Yes	Migrating to new selective router - schedule has moved	March '03 deployment scheduled
Washington County	VA	1/4/2002	Initially No - Now Yes	Initially a facilities issue - Now Trunks are due 1/24/03	February '03 deployment scheduled
Madison County	NC	01/08/02	No	As of 9/17/02 - PSAP still working with LEC (Verizon) to get ready	PSAP advised Triton to call back after 12/1/02 - As of 1/24/03 no change in PSAP status.
Botetourt County	VA	1/17/2002	Initially No - Now Yes	PSAP is now Ready	March '03 deployment scheduled
Johnston County	NC	1/23/2002	Yes	PSAP Ready - previous communications error corrected	March '03 deployment scheduled
City of Dunn	NC	3/4/2002	Yes	PSAP Ready - previous communications error corrected	March '03 deployment scheduled
City of Colonial Heights	VA	3/4/2002	Yes	Initially a facilities issue -Trunks due 2/4/03	February '03 deployment scheduled
Goochland County	VA	3/20/2002	Possibly	Waiting for update from PSAP -- Not responsive	Trunks ready for install upon notification from PSAP
Amelia County	VA	3/22/2002	Initially No - Now Yes	Initially a facilities issue -Trunks due 3/12/03	March '03 deployment scheduled
Smyth County	VA	4/18/2002	Yes	Initially a facilities issue -Trunks due 3/12/03	March '03 deployment scheduled
Town of Vinton	VA	5/23/2002	Initially No - Now Yes	is now ready	(March '03 deployment scheduled
Greene County	VA	5/28/2002	Yes	Initially a facilities issue - Trunks due 2/24/03	February '03 deployment scheduled
Spotsylvania County	VA	6/5/2002	Yes	Initially a facilities issue - Trunks due 2/24/03	February '03 deployment scheduled
Caroline County	VA	6/25/2002	Initially No - Now Yes	Initially a facilities issue -Trunks due 2/17/03	February '03 deployment scheduled
Hart County	GA	07/11/02	Yes	As of 1/16/03 PSAP has decided to proceed with Phase I request.	1/20/03 Triton has started implementation process.
Dinwiddie County	VA	8/8/2002	Yes	PSAP ready	March '03 deployment scheduled
Harnett County	NC	8/26/2002	Yes	PSAP ready	March '03 deployment scheduled
Madison County	VA	9/5/2002	No	PSAP is now not ready until May 2003	Per PSAP 1/17/03
Fluvanna County	VA	9/16/2002	Yes	PSAP Ready	March '03 deployment scheduled

**Triton PCS License Company, L.L.C. - Pending E911 Phase II Requests**

PSAP	State	Date of Phase II Request	Considered Valid?	Status
Chesterfield	VA	2/8/2001	Yes	Richmond BTA Market Area - Market plan has been reviewed and approved by Triton - initial deployment of TDOA equipment installed by Grayson in this market area in January 2003. This initial deployment has undergone initial connectivity testing and accuracy testing - PSAP integration to occur in February 2003. Additional TDOA equipment is scheduled to be deployed in February 2003. In addition, certain sites have shown the need for AOA equipment - Initial tower loading, lease and zoning analysis is underway at this time.
City of Virginia Beach	VA	3/13/2001	Yes	Norfolk BTA Market Area - TDOA equipment is installed in this market area and has undergone initial connectivity testing by Grayson - Initial accuracy testing is completed with acceptable results - PSAP integration scheduled for February 2003.
York	VA	3/14/2001	Yes	Norfolk BTA Market Area - TDOA equipment is installed in this market area and has undergone initial connectivity testing by Grayson - Initial accuracy testing is completed with acceptable results - Initial individual PSAP testing is scheduled for the last week in January 2003.
Spartanburg	SC	3/20/2001	Yes	Greenville BTA Market Area - TDOA equipment is installed in this market area and has undergone initial connectivity testing by Grayson - Initial accuracy testing is completed with acceptable results - PSAP integration scheduled for February 2003.
City of Hampton	VA	3/21/2001	Yes	Norfolk BTA Market Area - TDOA equipment is installed in this market area and has undergone initial connectivity testing by Grayson - Initial accuracy testing is completed with acceptable results - Initial individual PSAP testing is scheduled for the last week in January 2003.
City of Suffolk	VA	3/26/2001	Yes	Norfolk BTA Market Area - TDOA equipment is installed in this market area and has undergone initial connectivity testing by Grayson - Initial accuracy testing is completed with acceptable results - Initial individual PSAP testing is scheduled for the last week in January 2003.
City of Newport News	VA	3/27/2001	Yes	Norfolk BTA Market Area - TDOA equipment is installed in this market area and has undergone initial connectivity testing by Grayson - Initial accuracy testing is completed with acceptable results - Initial individual PSAP testing is scheduled for the last week in January 2003.
City of Chesapeake	VA	3/28/2001	Yes	Norfolk BTA Market Area - TDOA equipment is installed in this market area and has undergone initial connectivity testing by Grayson - Initial accuracy testing is completed with acceptable results - Initial individual PSAP testing is scheduled for the last week in January 2003.
City of Norfolk	VA	4/1/2001	Yes	Norfolk BTA Market Area - TDOA equipment is installed in this market area and has undergone initial connectivity testing by Grayson - Initial accuracy testing is completed with acceptable results - Initial individual PSAP testing is scheduled for the last week in January 2003.
James City County	VA	4/4/2001	Yes	Norfolk BTA Market Area - TDOA equipment is installed in this market area and has undergone initial connectivity testing by Grayson - Initial accuracy testing is completed with acceptable results - Initial individual PSAP testing is scheduled for the last week in January 2003.
City of Portsmouth	VA	3/20/2001	Yes	Norfolk BTA Market Area - TDOA equipment is installed in this market area and has undergone initial connectivity testing by Grayson - Initial accuracy testing is completed with acceptable results - Initial individual PSAP testing is scheduled for the last week in January 2003.
Charlottesville City - UVA - Albemarle County	VA	6/21/2001	Yes	Charlottesville BTA Market Area - This PSAP area has undergone initial market planning by Grayson - Zoning issues have held up installation at cell sites. Within Albemarle County any and all changes at a cell site must undergo zoning approval. This includes items such as GPS antennas and external cabinets at many self contained cell sites - Zoning applications have been filed and are awaiting approval.
City of Richmond	VA	9/6/2001	Yes	Richmond BTA Market Area -Market plan has been reviewed and approved by Triton - initial deployment of TDOA equipment installed by Grayson in this market area in January 2003. This initial deployment has undergone initial connectivity testing and accuracy testing - PSAP integration to occur in February 2003. Additional TDOA equipment is scheduled to be deployed in February 2003. In addition, certain sites have shown the need for AOA equipment - Initial tower loading, lease and zoning analysis is underway at this time.

## APPENDIX B

PSAP	State	Date of Phase II Request	Considered Valid?	Status
City of Winchester	VA	9/13/2001	Yes	Winchester BTA Market Area - Initial market planning for this PSAP request area has indicated the need for AOA use to provide adequate coverage for accurate locations. This is due to the configuration of Triton's network and the fewer number of available sites that actual service this area - Initial tower loading, lease and zoning analysis is underway at this time.
City of Martinsville / Henry County	VA	9/17/2001	Yes	Martinsville Bta Market Area - Initial market design provided by Grayson has been approved - Sites are scheduled for initial installation of TDOA equipment in February 2003.
City of Lynchburg	VA	9/24/2001	Yes	Lynchburg BTA Market Area - Initial market planning for this PSAP request area has indicated the need for AOA use to provide adequate coverage for accurate locations. This is due to the configuration of Triton's network and the fewer number of available sites that actual service this area - Initial tower loading, lease and zoning analysis is underway at this time.
Accomack/Norhampton Counties	VA	9/25/2001	Yes	Norfolk BTA Market Area - TDOA equipment is installed in this market area and has undergone initial connectivity testing by Grayson - Initial accuracy testing is completed with acceptable results - Initial individual PSAP testing is scheduled for the first week in January 2003. In addition, certain sites have shown the need for AOA equipment - Initial tower loading, lease and zoning analysis is underway at this time.
Henrico	VA	10/18/2001	Yes	Richmond ETA Market Area - Market plan has been reviewed and approved by Triton -initial deployment of TDOA equipment installed by Grayson in this market area in January 2003. This initial deployment has undergone initial connectivity testing and accuracy testing - PSAP integration to occur in February 2003. Additional TDOA equipment is scheduled to be deployed in February 2003. In addition, certain sites have shown the need for AOA equipment - Initial tower loading, lease and zoning analysis is underway at this time.
City of Fayetteville	NC	10/19/2001	Yes	Fayetteville BTA Market Area - Initial market design provided by Grayson has been approved - A portion of the required sites are scheduled for initial installation of TDOA equipment in February 2003. - Additionally some sites require AOA deployment - Initial tower loading, lease and zoning analysis is underway at this time.
Greenville County	SC	11/14/2001	Yes	Greenville ETA Market Area - Initial market design provided by Grayson has been approved - Sites are scheduled for initial installation of TDOA equipment in February 2003
Warren County	VA	11/19/2001	Yes	Winchester BTA Market Area - Initial market planning for this PSAP request area has indicated the need for AOA use to provide adequate coverage for accurate locations. Initial tower loading, lease and zoning analysis is underway at this time.
Tennessee - Statewide request	TN	12/28/2001	Yes	Tennessee Market Area - Initial market design provided by Grayson has been approved - Sites are scheduled for initial installation of TDOA equipment in February 2003.
Johnston County	NC	1/23/2002	Yes	Rocky Mount BTA Market Area - Initial market planning for this PSAP request area has indicated the need for AOA use to provide adequate coverage for accurate locations. Initial tower loading, lease and zoning analysis is underway at this time.
City of Salem	VA	3/6/2002	Yes	Roanoke BTA Market Area - Initial market planning for this PSAP request area has indicated the need for AOA use to provide adequate coverage for accurate locations. Initial tower loading, lease and zoning analysis is underway at this time.
Pittsylvania County	VA	4/4/2002	Yes	Danville ETA Market Area - Initial market planning for this PSAP request area has indicated the need for AOA use to provide adequate coverage for accurate locations. Initial tower loading, lease and zoning analysis is underway at this time.
Rockbridge County (Lexington & Buena Vista)	VA	5/23/2002	Yes	Roanoke ETA Market Area - Initial market planning for this PSAP request area has indicated the need for AOA use to provide adequate coverage for accurate locations Initial tower loading, lease and zoning analysis is underway at this time.
Catawba County	NC	5/24/2002	Yes	provide adequate coverage for accurate locations Initial tower loading, lease and zoning analysis is underway at this time.
Duplin County	NC	6/5/2002	Yes	Go dsboro BTA Market Area - n.i.a market planning for this PSAP request area has indicated the need for AOA use to provide adequate coverage for accurate locations. Initial tower loading, lease and zoning analysis is underway at this time.
New Hanover County	NC	2/26/2002	Yes	Wilmington BTA Market Area - Initial market design provided by Grayson has been approved - A portion of the required sites are scheduled for initial installation of TDOA equipment in February 2003 - Additionally some sites require AOA deployment - Initial tower loading, lease and zoning analysis is underway at this time.
Hart County	GA	7/11/2002	Yes	This PSAP is currently only being served with one cell site that actually physically does not reside within the PSAP area (calls from two of the three sectors on the site are routed to this PSAP) In addition, the site in question is on the edge of Triton's network. The PSAP that handles the adjoining county to Hart County has yet to request Phase II. The parties have agreed to defer implementation until such time as provision of location information is practical.

## APPENDIX B

PSAP	State	Date of Phase II Request	Considered Valid?	Status
County of Dinwiddie	VA	8/8/2002	Yes	Richmond BTA Market Area - Market plan has been reviewed and approved by Triton - initial deployment of TDOA equipment installed by Grayson in this market area in January 2003. This initial deployment has undergone initial connectivity testing and accuracy testing - PSAP integration to occur in February 2003. Additional TDOA equipment is scheduled to be deployed in February 2003. In addition, certain sites have shown the need for AOA equipment - Initial tower loading, lease and zoning analysis is underway at this time.
Hoke County	NC	8/19/2002	Yes	Fayetteville BTA Market Area - Initial market design provided by Grayson has been approved - A portion of the required sites are scheduled for initial installation of TDOA equipment in February 2003. - Additionally some sites require AOA deployment - Initial tower loading, lease and zoning analysis is underway at this time.
McDowell County	NC	8/22/2002	Yes	Asheville-Hendersonville BTA Market Area - Initial market planning for this PSAP request area has indicated the need for AOA use to provide adequate coverage for accurate locations. Initial tower loading, lease and zoning analysis is underway at this time.
Harnett County	NC	8/26/2002	Yes	Rocky Mount BTA Market Area - Initial market planning for this PSAP request area has indicated the need for AOA use to provide adequate coverage for accurate locations. Initial tower loading, lease and zoning analysis is underway at this time.
City of New Bern	NC	8/27/2002	Yes	New Bern BTA Market Area - Initial market planning for this PSAP request area has indicated the need for AOA use to provide adequate coverage for accurate locations. Initial tower loading, lease and zoning analysis is underway at this time.
Columbus County	NC	9/10/2002	Yes	Wilmington BTA Market Area - Initial market design provided by Grayson has been approved - A portion of the required sites are scheduled for initial installation of TDOA equipment in February 2003. - Additionally some sites require AOA deployment - Initial tower loading, lease and zoning analysis is underway at this time.
Nash County	NC	9/19/2002	Yes	Rocky Mount BTA Market Area - Initial market planning for this PSAP request area has indicated the need for AOA use to provide adequate coverage for accurate locations. Initial tower loading, lease and zoning analysis is underway at this time.
City of Lenoir	NC	10/18/2002	Yes	Hickory-Lenoir BTA Market Area - Initial market planning for this PSAP request area has indicated the need for AOA use to provide adequate coverage for accurate locations. Initial tower loading, lease and zoning analysis is underway at this time. City of Lenoir Phase II compliance date is 4/18/03 (six months).
Haywood County	NC	10/23/2002	Yes	Asheville-Hendersonville BTA Market Area - Initial market planning for this PSAP request area has indicated the need for AOA use to provide adequate coverage for accurate locations. Initial tower loading, lease and zoning analysis is underway at this time - Haywood County Phase II compliance date is 4/23/02 (six months).

## CERTIFICATE OF SERVICE

I, Constance Randolph, do hereby certify that on this 3rd day of February, 2003, a copy of the foregoing TRITON PCS LICENSE CO. L.L.C. Quarterly E911 Report was served by U.S. Mail, first-class postage prepaid or by hand delivery to the following:

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